REMARKS

The Office Action dated June 14, 2007 has been received and carefully noted. The above amendments to the specification and claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-26 have been amended to more particularly point out and distinctly claim the subject matter which is the invention. No new matter has been added. Claims 1-26 are submitted for reconsideration

Claims 1-26 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 7,123,910 to Lucidarme. The rejection is traversed as being based on a reference that neither teaches nor suggests the elements of claims 1-26.

Claim 1, upon which claims 2-9 depend, recites a method for implementing a signalling bearer connection in a distributed radio access network. The method includes creating a first interface instance between an interworking unit and at least one of the networks selected from a group of networks including a core network and a neighbouring radio access network. The method also includes creating a second interface instance between the interworking unit and a set of base stations and assigning temporary identifier information to user equipment that has a connection to a base station. The method also includes mapping of the signalling traffic between the first and the second interface instances in the interworking unit, the mapping assigning signalling traffic from the first interface instance to the second interface instance based on the temporary identifier information.

Claim 11, upon which claims 12-18 depend, recites a system for implementing a distributed radio access network including a set of base stations, at least one of a core network and a neighbouring radio access network and an interworking unit for connecting the core network to the set of base stations and to at least one of the networks. The interworking unit includes a first interface instance between the interworking unit and at least one of the networks, a second interface instance between the interworking unit a set of base stations, a mapping unit for mapping the signalling traffic between the first and the second interface instances. The mapping assigns signalling traffic from the first interface instance to the second interface instance based on temporary identifier information associated with a user equipment.

Claim 19, upon which claims 20-26 depends, recites an interworking unit connected to at least one of a core network and a neighbouring radio access network and to a set of base stations in a distributed radio access network. The interworking unit includes a first interface instance between the interworking unit and at least one of the networks, a second interface instance between the interworking unit and a set base stations which has been equipped with radio access control equipment. The interworking unit includes mapping unit for mapping the signalling traffic between the first and the second interface instances. The mapping assigns signalling traffic from the first interface instance to the second interface instance based on temporary identifier information associated with a user equipment, whereupon the interworking unit functions as a logical radio network controller.

As outlined below, the cited reference does not teach or suggest each of the elements of the pending claims.

Lucidarme discloses communication systems and methods for allowing a single mode mobile terminal to support mobile assisted signal strength measurement operations in both a fixed frequency reuse based communication network and an adaptive channel allocation based communication network. Candidate base station signal strength measurements are requested by a fixed frequency reuse type network, measured by the mobile terminal and provided to the fixed frequency reuse type network which is seeking to identify a strongest signal for mobile assisted handover operations. In addition, interference signal strength measurements are requested by an adaptive channel allocation type network, measured by the mobile terminal and provided to the adaptive channel allocation type network by the mobile terminal. No redundant circuitry is required in the mobile terminal. Instead, the mobile terminal executes the same operations using the same hardware regardless of whether the requested measurement is of a candidate signal strength or an interference signal.

Applicant submits that Lucidarme does not teach or suggest each of the elements of the pending claims. Each of independent claims 1, 11 and 19, in part, recites a second interface instance between the interworking unit and a set of base stations. Each of independent claims 1, 11 and 19, in part, also recites that an interworking unit maps the signalling traffic between the first and the second interface instances, the mapping assigning signalling traffic from the first interface

instance to the second interface instance based on the temporary identifier information. Lucidarme does not teach or suggest these features.

Lucidarme discloses communication systems and methods that allow a single mode mobile terminal to support mobile assisted signal strength measurement operations in both a fixed frequency reuse based communication and an adaptive channel allocation based communication network. Lucidarme basically discloses performing Radio Access Bearer (RAB) relocation to another network. In order to do that, a SGSN in Lucidarme receives a request for a new RAB for connecting to another network. The SGSN prepares the new routing path to the selected network. See at least Col. 10, lines 39-65 of Lucidarme.

Lucidarme fails to teach or suggest that the second interface instance is towards a set of IP base stations. As noted above, the pending claims recite that a temporary identifier assigned to user equipment is used to map signaling traffic between the first and second interface instances in the interworking unit. In other words, the temporary identifier also identifies within the interworking unit a correct IP base station towards which the signaling traffic is intended. The temporary identifier disclosed in Lucidarme does not identify an IP base station at the same time. Furthermore, Lucidarme does not teach or suggest that the interworking unit hides a large amount of IP base station from the core network and the neighbouring radio access network. Based on the distinctions noted above, Applicant respectfully asserts that the rejection under 35 U.S.C. §102(e) should be withdrawn because Lucidarme fails

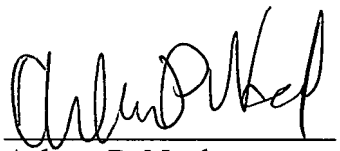
to teach or suggest each feature of claims 1, 11 and 19 and hence, dependent claims 2-10, 12-18 and 20-26 thereon.

As noted previously, claims 1-26 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 1-26 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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